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Attorneys for Defendant Sylviane Whitmore

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

SYLVIANE WHITMORE,

LARRY MCDANIEL,

Defendants.

Case No.: 2:17-cr-110 APG-DJA

**STIPULATION TO EXTEND
DEADLINES; PROPOSED ORDER**

The parties, Sylviane Whitmore, by and through her counsel, Lisa A. Rasmussen, Larry McDaniel, by and through his counsel, Daniel Hill, and the United States, by and through its counsel, Assistant United States Attorney Richard Anthony Lopez, hereby stipulate as follows:

1. Presently, the supplemental briefing on McDaniel and Whitmore's Motions for New Trial are due on December 17, 2021. ECF 246.
2. Defense counsel need additional time to prepare the supplements, in part because Mr. Hill has not received Mr. McDaniel's entire file from McDaniel's

prior counsel, Todd Leventhal. Additionally, neither Ms. Rasmussen nor Mr. Hill participated in the trial in this case, so there is substantial additional review that needs to be completed and neither are able to complete the supplements on or before December 17, 2021.

3. Defendants propose the following extensions of time:
 - a. Whitmore and McDaniel's supplement's due on January 18, 2022;
 - b. Government's Response due on February 18, 2022;
 - c. Whitmore and McDaniel's Replies due on March 4, 2022.
4. The government agrees to these extended dates but does not waive any rights to object to any procedural infirmities nor does this stipulation confer any statutory extensions upon the defendants unless the court finds cause for the same, which has yet to be determined.
5. The government's forfeiture motion, ECF 232, would continue to be held in abeyance and the sentencing hearings set for April 21, 2022 can later be adjusted as and if needed by the parties and/or the court.
6. Denial of this request would cause prejudice to the Defendants Whitmore and McDaniel and this request for an extension of time is not made for the purpose of delay.

Dated this 15th day of December, 2021.

The Law Offices of Kristina Wildeveld & Associates,

/s/ Lisa A. Rasmussen

LISA A. RASMUSSEN, ESQ.
Counsel for Sylviane Whitmore

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1 **Hill Law Firm,**

2 */s/ Daniel Hill*

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4 DANIEL HILL, ESQ.
5 Counsel for Larry McDaniel

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7 **CHRISTOPHER CHIOU,**
8 **Acting United States Attorney**
9 **District of Nevada**

10 */s/ Richard Anthony Lopez*

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12 BY: RICHARD ANTHONY LOPEZ
13 Assistant United States Attorney

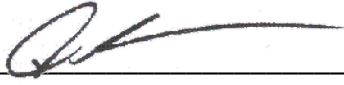
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15 **ORDER**

16 Pursuant to the Stipulation of the parties, and good cause appearing,

17 IT IS HEREBY ORDERED that the briefing schedule set on October 5, 2021 is
18 hereby extended as follows:

- 19 a. Whitmore and McDaniel's supplement's due on January 18, 2022;
20 b. Government's Response due on February 18, 2022;
21 c. Whitmore and McDaniel's Replies due on March 4, 2022.

22 Dated: December 20, 2021

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25 _____
26 The Honorable Andrew P. Gordon
27 United States District Judge
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